

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SUMMIT FAMILY MEDICAL PRACTICE, P.C.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action
	:	No. 02-3783
THE PHILADELPHIA CONTRIBUTIONSHIP	:	
INSURANCE COMPANY,	:	
	:	
Defendant.	:	

MOTION FOR RECONSIDERATION OF THE ORDER  
GRANTING PLAINTIFF'S MOTION TO COMPEL DISCOVERY  
AND FOR PROTECTIVE ORDER

COMES NOW the Defendant, The Philadelphia Contributionship Insurance Company, by and through its attorneys, and respectfully moves this Honorable Court to reconsider this Honorable Court's Order of October 16, 2002, in which it granted Plaintiff's Motion to Compel Discovery, or, alternatively, requests this Honorable Court to grant a protective order limiting the number and scope of Interrogatories propounded by the Plaintiff. This Honorable Court is referred to the attached brief Memorandum in Support of Defendant's Motion.

Respectfully submitted,

MOLDAWER & MARSHALL, P.C.

By:

John Marshall  
451 Hungerford Drive  
Suite 200  
Rockville, MD 20850  
(301) 340-3200

By: \_\_\_\_\_

Alfred J. Merlie, Esquire  
The Pavilion  
261 Old York Road  
Suite 424  
Jenkintown, PA 19046  
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Counsel for Defendant

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion for Reconsideration of the Order Granting Plaintiff's Motion to Compel Discovery and for Protective Order was served, by first class mail, postage prepaid, this \_\_\_\_\_ day of \_\_\_\_\_, 2002, upon:

Michael J. Saltzman, Esquire  
1608 Walnut Street  
19th Floor  
Philadelphia, PA 19103

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John Marshall

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Plaintiff,	:	
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	:	No. 02-3783
THE PHILADELPHIA CONTRIBUTIONSHIP	:	
INSURANCE COMPANY,	:	
	:	
Defendant.	:	
	:	

## ORDER

UPON CONSIDERATION of Defendant The Philadelphia  
Contributionship Insurance Company's Motion for Reconsideration of  
the Order Granting Plaintiff's Motion to Compel Discovery and for  
Protective Order, and any opposition thereto, it be and hereby is  
this day of , 2002,

ORDERED, that The Philadelphia Contributionship Insurance Company's Motion is GRANTED, and it is further

ORDERED that in consideration of the belated filing of Plaintiff's written discovery requests, Defendant is hereby relieved of the obligation to provide responses to Plaintiff's Interrogatories or Request for Production of Documents.

Copies to:

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